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AMENDMENTS TO THE DRAWINGS

The attached replacement sheet, labeled "Replacement Sheet," includes changes to the previously presented Figure 4. This replacement sheet replaces the previously presented drawing sheet including Figure 4. In the Replacement Sheet, "Figure 4a" and "Figure 4b" have been added to identify the views illustrated. "Figure 4" has been deleted. No new matter has been added by the present amendment to the drawings.

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REMARKS

I. INTRODUCTION

In response to the non-final Office Action mailed September 6, 2006, the Assignee submits the enclosed amendments and remarks.

By the present amendment, claims 1, 9, 18, 28, 33, 36, 39, 42, 45, and 48 have been amended. Claims 1, 9, 18, 39, 42, and 45 have been amended to recite, "wherein the UCID is different from the UUID, and the UCID is distributed to a single customer and the UUID is not distributed ~~maintained without disclosure~~ to the customer." Claims 28, 33, 36, and 48 have been amended to recite, "wherein the UCIDs are different from the corresponding UUIDs, and the UCIDs are distributed to a single customer and the UUIDs are not distributed ~~maintained without disclosure~~ to the customer." Examples for support for the amendment may be found in the specification on page 4, lines 15-24, page 8, lines 19-32, and page 9, line 24 – page 10, line 3.

Claim 1 has also been amended to recite, "assigning a unique customer number ("UCID") for each record entry contained in the matched customer file and the non-matched customer file." (Underlining supplied). Claim 48 has also been amended to recite "assigning a set of unique customer identifiers ("UCID's") for each customer file, each UCID within the set being associated with each record entry contained in the matched customer file and the non-matched customer file corresponding to the set of UCID's." (Underlining supplied). An example of support for the amendment may be found in the specification on page 8, lines 19-20.

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The specification has been amended on pages 2 and 7 to correct grammatical errors. The specification has also been amended on page 5 to correctly identify FIG. 4a in the "Brief Description of the Drawings" section. The specification has also been amended on page 5 to include a brief description of FIG. 4b in the "Brief Description of the Drawings" section, support for which may be found in the specification on page 10, lines 23-24. The specification has been amended on page 10 to correct a grammatical error and to correctly identify FIG. 4a and FIG. 4b in the "Detailed Description" section.

FIG. 4 has been amended to delete "Figure 4" and add "Figure 4a" and "Figure 4b." Support for the amendment may be found in the amended specification on page 10, line 11 to page 11, line 5.

After entry of the present amendment and response, claims 1-53 remain pending in the present application. No new matter has been added. The present amendment and response is believed to traverse all of the Office Action rejections for at least the reasons presented in the remarks below.

II. OBJECTION TO DRAWINGS UNDER 37 CFR § 1.84 (b)

The Office Action objected to the drawings under 37 CFR § 1.84(h). Specifically, the Office Action stated Figure 4 contains partial views. Figure 4 has been amended by the present response to delete "Figure 4" and add labels "Figure 4a" and "Figure 4b" associated with the embodiments illustrated. Accordingly, the Attorney for the Assignee submits that the amended drawings do not contain partial views and requests reconsideration and withdrawal of the objection.

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III. OBJECTION TO DRAWINGS UNDER 37 CFR § 1.83(a)

The Office Action objected to the drawings under 37 CFR § 1.83(a) as failing to show logical flow details as described in the specification. The Office Action further cited MPEP § 608.02(d) and stated that “any structural detail that is essential for a proper understanding of the disclosed invention should be shown in the drawing.” (Office Action, pg. 3). The objection is respectfully traversed for the reasons set forth below.

37 CFR § 1.83(a) and MPEP § 608.02(d) state, “[t]he drawing in a nonprovisional application must show every feature of the invention specified in the claims. However, conventional features disclosed in the description and claims, where their detailed illustration is not essential for a proper understanding of the invention, should be illustrated in the drawing in the form of a graphical drawing symbol or a labeled representation (e.g., a labeled rectangular box).” (Emphasis supplied). Accordingly, the Attorney for the Assignee submits that failing to show logical flow details as described in the specification is not a proper basis for objection under 37 CFR § 1.83(a) or MPEP § 608.02(d). (Emphasis supplied). In addition, the Attorney for the Assignee submits that the drawings illustrate embodiments described in the “Detailed Description” section of the specification. Reconsideration and withdrawal of the objection is respectfully requested.

IV. REJECTION OF CLAIMS 1-8 AND 48-53 UNDER 35 U.S.C. § 101

The Office Action rejected claims 1-8 and 48-53 under 35 U.S.C. 101 as being directed to non-statutory subject-matter. Specifically, the Office Action stated that “the claim recites a step for generating a ‘non-matched customer file,’ but does not present a

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link in terms of updating a customer file” and that “[t]he claim recites assigning a UCID in ‘the customer file’ but does not specify which customer file ... is assigned the UCID.” (Office Action pg. 5). Claim 1 has been amended to recite “assigning a unique customer number (“UCID”) for each record entry contained in the matched customer file and the non-matched customer file.” (Underlining supplied). Claim 48 has been amended to recite “assigning a set of unique customer identifiers (“UCID’s”) for each customer file, each UCID within the set being associated with each record entry contained in the matched customer file and the non-matched customer file corresponding to the set of UCID’s.” (Underlining supplied). Claims 2-8 and 49-53 are ultimately dependent on claim 1 or 48. Accordingly, the Attorney for the Assignee submits that claims 1-8 and 48-53 are directed to statutory subject matter and respectfully requests reconsideration and withdrawal of the rejection.

V. REJECTION OF CLAIMS 1-53 UNDER 35 U.S.C. § 112, 1st PARAGRAPH

The Office Action rejected claims 1-53 under 35 U.S.C. § 112, 1st paragraph as failing to comply with the written description requirement. Specifically, the Office Action stated that “the specification does not appear to described the limitation of a ‘UUID is maintained without disclosure to the customer.’” (Office Action, pg. 5). For at least the reasons below, the rejection is respectfully traversed.

Claims 1, 9, 18, 39, 42, and 45 have been amended to recite, “wherein the UCID is different from the UUID, and the UCID is distributed to a single customer and the UUID is not distributed ~~maintained without disclosure~~ to the customer.” Claims 28, 33, 36, and

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48 have been amended to recite, "wherein the UCIDs are different from the corresponding UUIDs, and the UCIDs are distributed to a single customer and the UUIDs are not distributed ~~maintained without disclosure~~ to the customer." The Attorney for the Assignee submits that amended claims 1, 9, 18, 28, 33, 36, 39, 42, 45, and 48 are described in the specification.

Furthermore, "[a] description as filed is presumed to be adequate, unless or until sufficient evidence or reasoning to the contrary has been presented by the examiner to rebut the presumption. See, e.g., *In re Marzocchi*, 439 F.2d 220, 224, 169 USPQ 367, 370 (CCPA 1971). The examiner, therefore, must have a reasonable basis to challenge the adequacy of the written description. The examiner has the initial burden of presenting by a preponderance of evidence why a person skilled in the art would not recognize in an applicant's disclosure a description of the invention defined by the claims. *Wertheim*, 541 F.2d at 263, 191 USPQ at 97." (MPEP § 2163.04). The Attorney for the Assignee respectfully submits that the Office Action has failed its initial burden of presenting, by a preponderance of evidence, why a person skilled in the art would not recognize in an applicant's disclosure a description of the invention defined by the claims.

The Attorney for the Assignee respectfully submits that the recitation of "UUID is not distributed to the customer" is described in the specification. For example, on page 4, lines 15-24, the specification states, "[t]he use of two sets of unique identifiers [UCID and UUID] provides a way to decouple the information buyer's customer file and the information supplier's universe file. This decoupling provides several advantages. Among

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them are that it prevents inadvertent contamination of information between the customer database and the universe database. The universe database includes highly sensitive information, such as credit information and other regulated information. The decoupling provides a ways to prudently control highly sensitive information. In addition, the decoupling provides a way to protect against information theft. The decoupling also reduces the chance that one buyer will accidentally obtain access to another buyer's information."

On page 8, lines 19-32, the specification states, "[t]he supplier assigns a UCID to each record entry in MCF, as well as each record entry in NMCF 214. Those skilled in the art will understand that the assignment of the UCID's to the record entries in the CF or files derived therefrom may occur at any time after the CF 204 is delivered to the supplier and preferably before the supplier delivers an updated customer file ("UCF") to the buyer 202. Those skilled in the art will also understand that the MCF 212 and NMCF 214 need not be combined before being delivered to the buyer 202 since the CF 204 may be stored in various formats as long as a UCID can be used for all related data identified as a single record entry. After assigning a set of UCID's, the supplier creates a conversion table or other desired mapping, linking, associating, or correlating (hereinafter, "associating") functionality to associate the UUID's and UCID's (hereinafter, "CT" or "conversion table") 218. The CT 218 can be used in subsequent transfers of information from the supplier 206 to the buyer 202. The supplier 206 delivers an updated customer file ("UCF") 216 to the buyer 202 via any viable communicational links."

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On page 9, line 24 – page 10, line 3, the specification states, “[t]he use of two sets of unique identifiers, i.e., the UUID's for the record entries in the UF and the UCID's for the record entries in a CF provides several advantages. First, it provides a decoupling function that helps to protect security and integrity of different sets of databases. It provides safeguards against inadvertent dilution and contamination of data between the UF and a CF. In addition, the UF contains highly sensitive data, such as credit information and information subject to various federal or local laws. The use of different sets of identifiers for the UF and CF provides a way to control and prudently manage sensitive and/or regulated information. The UCID's cannot be used to ascertain credit or regulated information. Furthermore, an information thief cannot use a set of the UCID's to back trace the source of information. In this sense, the CT acts as a filter or a gateway to isolate the outside world from the UF, unlike the persistent key approach mentioned above.”

The above merely provides examples of support for a “UUID is not distributed to the customer” in the specification and other examples may exist in the specification as filed. (See e.g., Figures 1-4). Furthermore, “[t]he subject matter of the claim need not be described literally (i.e., using the same terms or *in haec verba*) in order for the disclosure to satisfy the description requirement. (MPEP § 2163.02).

Claims 2-8, 10-17, 19-27, 29-32, 34-35, 37-38, 40-41, 43-44, 46-47, and 49-53 are ultimately dependent on claim 1, 9, 18, 28, 33, 36, 39, 42, 45, or 48, for which arguments for allowance are provided above. Accordingly, the Attorney for the Assignee submits

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that claims 1-53 comply with the written description requirement under 35 U.S.C. § 112, 1st paragraph and respectfully requests reconsideration and withdrawal of the rejection.

VI. REJECTION OF CLAIMS 1-53 UNDER 35 U.S.C. §112, 2nd PARAGRAPH

The Office Action rejected claims 1-53 under 35 U.S.C. §112, 2nd paragraph as being indefinite for failing to point out and distinctly claim the invention. Specifically, the Office Action stated the limitation “the UUID is maintained without disclosure to the customer” is not clear and “[t]he term without disclosure is not clear and does not appear to be described in the specification.” (Office Action, pg. 6). For at least the reasons set forth below, the rejection is respectfully traversed.

Claims 1, 9, 18, 39, 42, and 45 have been amended to recite, “wherein the UCID is different from the UUID, and the UCID is distributed to a single customer and the UUID is not distributed ~~maintained without disclosure~~ to the customer.” Claims 28, 33, 36, and 48 have been amended to recite, “wherein the UCIDs are different from the corresponding UUIDs, and the UCIDs are distributed to a single customer and the UUIDs are not distributed ~~maintained without disclosure~~ to the customer.” The Attorney for the Assignee respectfully submits that amended claims 1, 9, 18, 28, 33, 36, 39, 42, 45, and 48 are clear and described in the specification.

In addition, “[a]ny claim containing a negative limitation which does not have basis in the original disclosure should be rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Note that a lack of literal basis in the specification for a negative limitation may not be sufficient to establish a *prima*

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facie case for lack of descriptive support. *Ex parte Parks*, 30 USPQ2d 1234, 1236 (Bd. Pat. App. & Inter. 1993). (Emphasis Supplied, MPEP § 2173.05(i)). The Attorney for the Assignee submits that the rejection of claims 1-53 under 35 U.S.C. § 112, 2nd paragraph was in error. The proper rejection should be under 35 U.S.C. § 112, 1st paragraph, arguments for which are provided in Section V of the present response.

Claims 2-8, 10-17, 19-27, 29-32, 34-35, 37-38, 40-41, 43-44, 46-47, and 49-53 are ultimately dependent on claim 1, 9, 18, 28, 33, 36, 39, 42, 45, or 48, for which arguments for allowance are provided above. Accordingly, the Attorney for the Assignee submits that claims 1-53 particularly point out and distinctly claim the subject matter of the invention and respectfully requests reconsideration and withdrawal of the rejection.

VII. REJECTION OF CLAIMS 1-53 UNDER 35 U.S.C. § 103

The Office Action rejected claims 1-16, 18-26, 28-31 and 33-53 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent no. 6,073,140 to *Charles D. Morgan* (hereinafter "*Morgan*-‘140”) in view of U.S. Patent No. 6,766,327 to *Charles D. Morgan, Jr.* (hereinafter "*Morgan*-‘327”). For at least the reasons provided below, this rejection is respectfully traversed. The Office Action did not reject claims 17, 27, and 32 as obvious and, accordingly, the Attorney for the Assignee does not address these claims in this section.

The Office Action stated *Morgan*-‘140 disclosed all the claimed subject matter in claims 1, 3, 6, 9, 11, 18-19, 28, 30, 33, 36, 38-39, 42, 45, 48, and 50-51 except “wherein the UCID is different from the UUID, and the UCID is capable of being distributed to a

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single customer and the UUID is capable of being maintained without disclosure to the customer.” The Office Action stated *Morgan-‘327* disclosed these elements.

Morgan-‘327 was filed August 12, 2002 as a continuation-in-part of U.S. Patent No. 6,523,041 to *Morgan*, filed on December 21, 1999 as a continuation-in-part of *Morgan-‘140*. The present application was filed on November 19, 2001. Even assuming *Morgan-‘327* discloses “wherein the UCID is different from the UUID, and the UCID is distributed to a single customer and a UUID that is maintained without disclosure to the customer,” which the Attorney for the Assignee is not conceding, the present application was filed before *Morgan-‘327*. Furthermore, neither *Morgan-‘140* nor U.S. Patent No. 6,523,041 to *Morgan* disclose a UCID that is different from a UUID and that the UCID is distributed to a single customer and a UUID that is not distributed to the customer or UUID’s that are not distributed to the customer, as recited in amended claims 1, 9, 18, 28, 33, 36, 39, 42, 45, and 48. Accordingly, *Morgan-‘327* is unavailable as prior art since the present application was filed before the filing date of *Morgan-‘327* and neither *Morgan-‘140* nor U.S. Patent No. 6,523,041 to *Morgan* disclose a UCID that is different from a UUID and that the UCID is distributed to a single customer and a UUID that is not distributed to the customer.

Furthermore, the Office Action has failed to establish a *prima facie* case for obviousness since there is no motivation to include a UCID that is different from a UUID or a UUID that is not distributed to the customer in *Morgan-‘140*. Even assumming that the UUID is similar to persistent keys for records in the vendor’s database and the UCID

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is similar to the persistent keys for records in the data customer's database, as stated by the Office Action on page 8, which the Attorney for the Assignee is not conceding, *Morgan-'140* requires the persistent keys in the vendor database and customer database identifying the same data structure to match. (See *Morgan-'140*, col. 3, lines 57-61). In addition, *Morgan-'140* states that, "[a] fundamental requirement of the disclosed invention is that each persistent key must be unique across the entire central database." (*Morgan-'140*, col. 4, lines 8-10). Accordingly, *Morgan-'140* teaches away from persistent keys in the vendor's database and persistent keys in the customer's database that are different since the persistent keys must match. *Morgan-'140* also teaches away from a persistent key in the vendor's database that is not distributed to the customer since the persistent keys are matched. Even assuming a UUID is similar to a persistent key in the vendor's database and a UCID is similar to a persistent key in a customer's database, *Morgan-'140* teaches away from a UCID that is different from a UUID and a UUID that is not distributed to the customer.

Accordingly, *Morgan-'140*, fails to disclose or suggest each element of independent claims 1, 9, 18, 28, 33, 36, 39, 42, 45, and 48. Since claims 2-8, 10-16, 19-26, 29-31, 34-35, 37-38, 40-41, 43-44, 46-47, and 49-53 are ultimately dependent on claim 1, 9, 18, 28, 33, 36, 39, 42, 45, or 48, *Morgan-'140* fails to disclose or suggest these claims as well. Allowance of claims 1-16, 18-26, 28-31, and 33-53 is respectfully requested.

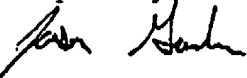
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CONCLUSION

Claims 1-53 are pending in the application. The Office Action rejections have been traversed by the present response. Claims 1-53 are believed to now be in condition for allowance. The Examiner is invited and encouraged to contact the undersigned attorney of record at (404) 745-2520 if such contact will facilitate a Notice of Allowance for claims 1-53. If any additional fees are due, the Commissioner is hereby authorized to charge any deficiency, or credit any overpayment, to Deposit Account No. 11-0855.

Respectfully submitted,



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